

SAN DIEGO REGIONS LE COR WATER QUALITY CONTROL BOARD

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April 19, 2004

Project No. 08EL.22894.04

Mr. John H. Robertus California Regional Water Quality Control Board, San Diego Region Industrial Compliance Unit 9174 Sky Park Court, Suite 100 San Diego, CA 92123

Subject:

Review of Complaint No. R9-2004-0061

7-Eleven Location No. 22894 1030 North Broadway Escondido, California Re: CA:14-0910.02:melbf

Dear Mr. Robertus:

SECOR International Incorporated (SECOR) on behalf of 7-Eleven Inc. (7-Eleven), has reviewed a notice of violation dated February 27, 2004 regarding the National Pollutant Discharge Elimination System (NPDES) permit for groundwater pumping and treatment at the subject site. The violations include instantaneous maximums of hydrogen sulfide and Total Suspended Solids (TSS) dated April 9, 2001 and August 7, 2001, respectively, and a 30-Day Average violation of TSS for the month of August 2001. SECOR has reviewed the historic files for the site and presents the following for consideration.

- Bi-weekly effluent samples for TSS (per requirements of the NPDES permit) were collected from September 13, 2000, to August 17, 2001 (23 samples total). TSS was below a laboratory reporting limit of 5.0 milligrams per liter (mg/L) in 19 samples, with concentrations of 8.0 mg/L, 13 mg/L, and 8.0 mg/L in three other samples. TSS concentrations are presented in Table 1. The only TSS concentration detected above the discharge limitation is the one cited in the complaint. Based on prior analytical results, and the results of one sample collected following the alleged violation, the reported concentration appears to be a statistical anomaly.
- There was a delay of approximately 2.5 years between the alleged discharge violations, and receipt of the complaint. This time lapse makes it impossible to recreate the sampling events, check sampling procedures or protocols, or make any determination of potential sources of either the hydrogen sulfide or the TSS.
- The groundwater extraction system operated on August 7, 2001, and again on August 17, 2001 to collect an additional TSS sample to confirm the August 7, 2001 results. The second sample collected was below the reporting limit of 5.0 mg/L for TSS. Approximately 107 gallons of water were discharged in August 2001, and the system was shut down after the August 17, 2001 sampling event. No additional water discharge occurred under the NPDES permit. SECOR obtained a sewer discharge permit from the City of Escondido, and the treatment system discharge line was connected to the sewer system. Therefore, this was a one-time exceedance of discharge limitations.

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Should you have any questions regarding this correspondence, please contact the undersigned at (619) 296-6195.

Milmelfor:

John P. Wainwright, P.E.

Principal Engineer

Respectfully,

SECOR International Incorporated

Patrick A. McConnell, R.G. #7205

Senior Geologist

Enclosures: Table 1 – Total Suspended Solids Results

cc: Ken Hilliard, 7-Eleven, Inc. John Wainwright, SECOR

TABLE 1 TOTAL SUSPENDED SOLIDS RESULTS

7-Eleven Location No. 22894

All concentrations in micrograms per liter (mg/L).

Sample ID	Sample Date	TSS
Effluent	9/13/00	<5.0
Effluent	9/27/00	<5.0
Effluent	10/9/00	8.0
Effluent	10/25/00	<5.0
Effluent	11/8/00	13
Effluent	11/21/00	<5.0
Effluent	12/6/00	<5.0
Effluent	12/20/00	<5.0
Effluent	1/3/01	<5.0
Effluent	1/15/01	<5.0
Effluent	2/5/01	<5.0
Effluent	2/12/01	13
Effluent	2/22/01	NA
Effluent	3/7/01	<5.0
Effluent	3/21/01	<5.0
Effluent	4/9/01	<5.0
Effluent	04/26/01	<5.0
Effluent	5/3/01	<5.0
Effluent	5/18/01	3.0
Effluent	6/6/01	<5.0
Effluent	6/18/01	<5.0
Effluent	7/9/01	<5.0
Effluent	8/7/01	240
Effluent	8/17/01	<5.0